

SC NAACP v. Alexander,
D.S.C. Case No. 3:21-cv-03302-MGL-TJH-RMG

EXHIBIT 1

To: Senate Redistricting[Redistricting@scsenate.gov]
Cc: Stuart Naifeh[snaifeh@naacpldf.org]; Raymond Audain[raudain@naacpldf.org]; John Cusick[jcusick@naacpldf.org]; Steven Lance[slance@naacpldf.org]; Evans Moore[emoore@naacpldf.org]; Tonya Farrow Chestnut[tchestnut@naacpldf.org]; Somil Trivedi[strivedi@aclu.org]; Patricia Yan[pyan@aclu.org]; Samantha Osaki[sosaki@aclu.org]; Brenda Murphy[brendacmurph@gmail.com]; Allen Chaney[achaney@aclusc.org]; Frank Knaack[fknaack@aclusc.org]; harveypeeler@scsenate.gov[harveypeeler@scsenate.gov]; shanemassey@scsenate.gov[shanemassey@scsenate.gov]; bradhutto@scsenate.gov[bradhutto@scsenate.gov]; pathenegagan@schouse.gov[pathenegagan@schouse.gov]; ivorythigpen@schouse.gov[ivorythigpen@schouse.gov]; Leah Aden[laden@naacpldf.org]
From: Leah Aden[laden@naacpldf.org]
Sent: Fri 10/8/2021 2:02:51 PM Eastern Daylight Time
Subject: RE: Proposed Congressional and Senate Maps Submissions - v2
Attachment: Letter to Sen Jud Redistricting Subcomm - Submitting Congressional and Senate Maps (10-8-21).pdf
Attachment: Appendices 1-3 - Previous Correspondence and Proposed Maps.pdf

Chair Rankin and Subcommittee Members:

Please see below. We are resending the attached letter and appendices, referenced below, after they bounced back. However, we have been unable to send the data files as a zip file (and are contacting admin@scslatehouse.gov to resolve this). As mentioned below, we are in the process of submitting the requested data via the online portal as well.

(end)

From: Leah Aden <laden@naacpldf.org>
Sent: Friday, October 8, 2021 1:43 PM
To: Senate Redistricting <Redistricting@scsenate.gov>
Cc: Leah Aden <laden@naacpldf.org>; Stuart Naifeh <snaifeh@naacpldf.org>; Raymond Audain <raudain@naacpldf.org>; John Cusick <jcusick@naacpldf.org>; Steven Lance <slance@naacpldf.org>; Evans Moore <emoore@naacpldf.org>; Tonya Farrow Chestnut <tchestnut@naacpldf.org>; Somil Trivedi <strivedi@aclu.org>; Patricia Yan <pyan@aclu.org>; Samantha Osaki <sosaki@aclu.org>; Brenda Murphy <brendacmurph@gmail.com>; Allen Chaney <achaney@aclusc.org>; Frank Knaack <fknaack@aclusc.org>; harveypeeler@scsenate.gov; shanemassey@scsenate.gov; bradhutto@scsenate.gov; pathenegagan@schouse.gov; ivorythigpen@schouse.gov
Subject: Proposed Congressional and Senate Maps Submissions

Dear Chair Rankin and Subcommittee Members:

The NAACP Legal Defense and Educational Fund, Inc., American Civil Liberties Union, South Carolina State Conference of the NAACP—which has 77 branches and over 13,000 members throughout South Carolina—and ACLU of South Carolina write to submit Congressional and state Senate redistricting plans that are illustrative of ways this Subcommittee may comply with its affirmative constitutional and statutory obligations and other guiding redistricting principles. Equally important, we also write to reiterate our grave concerns that this body is ill-prepared to ensure a transparent process for considering maps that meaningfully reflect public input during all stages of the redistricting cycle.

As we conveyed in our letters of August 2, 2021, and September 27, 2021, this Subcommittee must, at minimum, meet its baseline affirmative obligations to comply with the U.S. Constitution and Section 2 of the Voting Rights Act (“VRA”) when developing redistricting plans. In satisfying these obligations, as explained in the attached letter of transmittal, officials must ensure that all South Carolinians have equal access to representation, and, that the voting strength of South Carolina’s racial minority voters is not illegally diluted or otherwise illegally minimized. To these ends, our proposed maps address the Fourteenth Amendment’s equal-population mandate, consider Section 2 compliance, and are informed by South Carolina’s voting patterns, history, and other relevant data and information. Our goal in developing these maps is to ensure that all voters have access to representation and Black voting power is not diluted in the process.

Attached to this email please find a letter of transmittal describing our proposed maps and these constitutional and statutory obligations and other guiding redistricting principles. In addition, we enclose the following for the Subcommittee’s consideration:

- as Appendix 1, correspondence during the present redistricting cycle between signatories and this body;
- as Appendix 2, two proposed congressional maps and associated statistical reports;
- as Appendix 3, a proposed Senate map and an associated statistical report for your consideration; and
- shapefiles and block equivalency files for our proposed maps (contained in the attached .zip folder titled “Datafiles”).

We will upload the requested block equivalency files for these maps to the Subcommittee’s online portal as well.

Please feel free to contact Leah Aden, Deputy Director of Litigation at the Legal Defense Fund, at laden@naacpldf.org, and Somil Trivedi, Senior Staff Attorney at the ACLU, at strivedi@aclu.org, with any questions or to discuss these issues in more detail. We look forward to hearing from you soon and working together for the people of South Carolina.

Sincerely,

Leah Aden
 Deputy Director of Litigation
 NAACP Legal Defense and Educational Fund, Inc.
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